

Fill in this information to identify the case:

Debtor 1 James Alfred Cruz

Debtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 24-00727 MJC**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: Philadelphia Federal Credit Union

Court claim no. (if known): 2

Last 4 digits of any number you use to identify the debtor's account: 0124

Property address:

151 Legion Road
Bloomsburg, PA 17815**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. ** Creditor agrees \$673.57 towards the pre-petition arrears was received from the Trustee prior to the Order for Relief entered 11/04/24.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>39,117.02</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>222.86</u>
c. Total. Add lines a and b.	(c)	\$ <u>39,339.88</u>

Creditor asserts that the debtor(s) are contractually obligated for 03 / 01 / 2023
the postpetition payment(s) that first became due on:

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Denise Carlon
Denise Carlon
09 Apr 2025, 16:32:42, EDT

Date 04/09/2025

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: James Alfred Cruz

Debtor(s)

Philadelphia Federal Credit Union

Movant

vs.

James Alfred Cruz

Debtor(s)

Jack N. Zaharopoulos,

Trustee

BK NO. 24-00727 MJC

Chapter 13

Related to Claim No. 2

CERTIFICATE OF SERVICE

RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on April 10, 2025, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

James Alfred Cruz
151 Legion Road
Bloomsburg, PA 17815

Attorney for Debtor(s) (via ECF)

Charles Laputka, Esq.
Laputka Law Offices
1344 W. Hamilton Street
Allentown, PA 18102

Trustee (via ECF)

Jack N. Zaharopoulos
Standing Chapter 13 (Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: April 10, 2025

/s/ Denise Carlon

Denise Carlon Esquire
Attorney I.D. 317226
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2363
dcarlon@kmlawgroup.com

Account History:

Borrower:	CRUZ,DARLENE Q	Address:	151 LEGION ROAD	Prin Bal:	\$181,442.16	Investor Type:	
Co-Borrower Name:	CRUZ,JAMES A	City:	BLOOMSBURG	Add Prin Bal:	\$0.00	Investor #:	
Due Date:	03/01/2023	State:	PA	Account Type:	First Mortgage - Conventional Without PMI	Investor Account #:	
Last Pmt Appd On:	09/27/2024	Zip Code:	17815	Total Pmt Amt:	\$1,464.51	PLS Client ID:	

Request Criteria: Type = All, Date Range = From 04/04/2024 To 04/04/2025

Row Count = 48													
Transaction Description	Applied Dt	Due Date	Payment	Principal Applied	Interest Applied	Escrow Applied	Esc Bal	Adv Bal	Suspense Applied	Corp Adv Applied	L/C Amt Applied	Fee Amt Applied	Fee Cd
Escrow Advance	04/03/2025	03/01/2023	\$1,608.84			\$1,608.84		\$9,890.11					
City Tax Disbursement	04/03/2025	04/01/2025	-\$1,608.84			-\$1,608.84	-\$1,608.84	\$8,281.27					
Property Pres Corp Adv	03/05/2025							\$8,281.27		\$20.00			
Misc Default Exp Corp Adv	03/03/2025							\$8,281.27		\$12.40			
Late Charge Assessed	02/18/2025	03/01/2023						\$8,281.27			-\$47.62		
Property Pres Corp Adv	02/06/2025							\$8,281.27		\$20.00			
Late Charge Assessed	01/17/2025	03/01/2023						\$8,281.27			-\$47.62		
Property Pres Corp Adv	01/06/2025							\$8,281.27		\$20.00			
Late Charge Assessed	12/17/2024	03/01/2023						\$8,281.27			-\$47.62		
Statutory Exp Corp Adv	12/12/2024							\$8,281.27		\$0.97			
Statutory Exp Corp Adv	12/12/2024							\$8,281.27		\$0.97			
Attorney Corp Advance	12/12/2024							\$8,281.27		\$125.00			
Property Pres Corp Adv	12/02/2024							\$8,281.27		\$20.00			
Escrow Advance Repymt	11/19/2024	03/01/2023				-\$364.41		\$8,281.27					
Funds Application	11/19/2024	03/01/2023				\$364.41	\$364.41	\$8,645.68	-\$364.41				
Statutory Exp Corp Adv	10/04/2024							\$8,645.68		\$199.00			
Statutory Exp Corp Adv	10/04/2024							\$8,645.68		\$3.71			
Statutory Exp Corp Adv	10/04/2024							\$8,645.68		\$3.71			
Attorney Corp Advance	10/04/2024							\$8,645.68		\$1,050.00			
Restricted Corp Adv Adj	10/02/2024		-\$20.00					\$8,645.68		-\$20.00			
Restricted Corp Adv Adj	10/02/2024		\$20.00					\$8,645.68		\$20.00			
Escrow Advance Repymt	09/27/2024	02/01/2023				-\$512.07		\$8,645.68					
Funds Application	09/27/2024	02/01/2023		\$346.48	\$605.96	\$512.07	\$512.07	\$9,157.75	-\$1,464.51				
Funds Application	09/26/2024	02/01/2023	\$419.40					\$9,157.75	\$419.40				
Property Pres Corp Adv	09/05/2024							\$9,157.75		\$20.00			
Restricted Corp Adv Adj	08/28/2024		-\$120.00					\$9,157.75		-\$120.00			
Restricted Corp Adv Adj	08/28/2024		\$120.00					\$9,157.75		\$120.00			
Funds Application	08/27/2024	02/01/2023	\$254.17					\$9,157.75	\$254.17				
Misc Corporate Adv Disb	08/23/2024							\$9,157.75		\$10.00			
Property Pres Corp Adv	08/05/2024							\$9,157.75		\$20.00			
Escrow Advance	08/01/2024	02/01/2023	\$2,575.26			\$2,575.26		\$9,157.75					
Consolidated Tax Disb	08/01/2024	08/01/2024	-\$2,575.26			-\$2,575.26	-\$2,575.26	\$6,582.49					
Property Pres Corp Adv	07/09/2024							\$6,582.49		\$20.00			
Attorney Corp Advance	06/07/2024							\$6,582.49		\$750.00			
Escrow Advance Repymt	05/28/2024	01/01/2023				-\$512.07		\$6,582.49					
Funds Application	05/28/2024	01/01/2023		\$345.33	\$607.11	\$512.07	\$512.07	\$7,094.56	-\$1,464.51				
Funds Application	05/24/2024	01/01/2023	\$40.49					\$7,094.56	\$40.49				
Funds Application	05/24/2024	01/01/2023	\$1,464.51					\$7,094.56	\$1,464.51				
Misc Corporate Adv Disb	05/20/2024							\$7,094.56		\$10.00			
Escrow Advance	05/08/2024	01/01/2023	\$2,924.17			\$2,924.17		\$7,094.56					

Hazard Ins Disbursement	05/08/2024	05/01/2024	-\$2,924.17			-\$2,924.17	-\$2,924.17	\$4,170.39					
Escrow Advance Repymt	04/23/2024	12/01/2022				-\$515.13		\$4,170.39					
Funds Application	04/23/2024	12/01/2022		\$344.18	\$608.26	\$515.13	\$515.13	\$4,685.52	-\$1,467.57				
Attorney Corp Advance	04/18/2024							\$4,685.52		\$450.00			
Escrow Advance	04/05/2024	12/01/2022	\$1,608.84			\$1,608.84		\$4,685.52					
City Tax Disbursement	04/05/2024	04/01/2024	-\$1,608.84			-\$1,608.84	-\$1,608.84	\$3,076.68					
Funds Application	04/05/2024	12/01/2022	\$82.43					\$3,076.68	\$82.43				
Funds Application	04/05/2024	12/01/2022	\$1,467.57					\$3,076.68	\$1,467.57				

U.S. Bankruptcy Court
Middle District of Pennsylvania

Notice of Electronic Claims Filing

The following transaction was received from Farrington, Michael on 5/30/2024 at 2:28 PM EDT

[File another claim](#)

Case Name: James Alfred Cruz
Case Number: [5:24-bk-00727-MJC](#)
Creditor Name: Cenlar FSB Attn BK Dept
 425 Phillips Blvd
 Ewing, NJ 08618
Claim Number: [2](#) [Claims Register](#)
Amount Claimed: \$195,004.58
Amount Secured: \$195,004.58
Amount Priority:

The following document(s) are associated with this transaction:

Document description:Main Document
Original filename:Cruz 24-00727 POC1.pdf
Electronic document Stamp:
 [STAMP bkecfStamp_ID=1009835235 [Date=5/30/2024] [FileNumber=18039777-0] [1c2b4d8f4918e895a24a085265741d6955f79c02417062fa616699721e917848cf6a7055b765bfb7a6c3afd0fac70a2bd24862c7eb25c318d060c33999026c8]]
Document description:Exhibit 410a
Original filename:C:\fakepath\Cruz 24-00727 POC 410a.pdf
Electronic document Stamp:
 [STAMP bkecfStamp_ID=1009835235 [Date=5/30/2024] [FileNumber=18039777-1] [b4f38d6edb7bd5a1293a2f3c788f8b64731aa065b9b321962b5c96e0f3fe20ca7145b01c2f4a29dcdddbde1ec4249a6a91ff52fd80c73c170aab188f61bbe17]]
Document description:Certificate of Service
Original filename:C:\fakepath\Cruz 24-00727 POC cos.pdf
Electronic document Stamp:
 [STAMP bkecfStamp_ID=1009835235 [Date=5/30/2024] [FileNumber=18039777-2] [3c59e651245524607b35c106814bc981c3d5d9f345b25abb787c37ff2c4e400223383aabde7d970bb8816ad878306b66e424c899e335c5ff32cd1ebf7a0ae8d]]
Document description:Exhibit escrow
Original filename:C:\fakepath\Cruz 24-00727 POC ea.pdf
Electronic document Stamp:
 [STAMP bkecfStamp_ID=1009835235 [Date=5/30/2024] [FileNumber=18039777-3] [170f7b0282e3b685901c415dca38bc630491b997c1cbf6e994889fac6d992a16db36834041765dbe0448e4d57dde4f109dfeceb1b99b967b4d463cd0c0434c9]]
Document description:Exhibit loan docs
Original filename:C:\fakepath\Cruz 24-00727 POC loan docs.pdf
Electronic document Stamp:
 [STAMP bkecfStamp_ID=1009835235 [Date=5/30/2024] [FileNumber=18039777-4] [62455023f114c62db826f5d971ff3b7c06f9121d94cb8fce1f43e9a4e122de05c400ecd28ffd427a4de0ba41f4f383c20ad5767516a0dd7f675af7131d02feed]]

5:24-bk-00727-MJC Notice will be electronically mailed to:

Michael Patrick Farrington on behalf of Creditor Philadelphia Federal Credit Union
 mfarrington@kmlawgroup.com

Charles Laputka on behalf of Debtor 1 James Alfred Cruz
 claputka@laputkalaw.com, jen@laputkalaw.com, jbolles@laputkalaw.com, laputka.charlesb@notify.bestcase.com

William J Levant on behalf of Creditor Philadelphia Federal Credit Union
 efile.wjl@kaplaw.com

United States Trustee
 ustpreion03.ha.ecf@usdoj.gov

Jack N Zaharopoulos
 TWecf@pamd13trustee.com

5:24-bk-00727-MJC Notice will not be electronically mailed to:

Fill in this information to identify the case:

Debtor 1 James Alfred Cruz
(Spouse, if filing)

United States Bankruptcy Court for the MIDDLE District of Pennsylvania

Case number 24-00727 MJC

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	Philadelphia Federal Credit Union Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom?		
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Cenlar FSB Attn BK Dept Name 425 Phillips Blvd Number Street Ewing, NJ 08618 City State Zip Code 609-883-3900 Contact phone BKelectronicnotices@cenlar.com Contact Email	Where should payments to the creditor be sent? (if different) Cenlar FSB Attn Payment Processing Name 425 Phillips Blvd Number Street Ewing, NJ 08618 City State Zip Code 609-883-3900 Contact phone BKelectronicnotices@cenlar.com Contact Email	
Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____			
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known)	Filed on MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing?		

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor	0124
7. How much is this claim?	<div><u>\$195,004.58</u></div> <div style="text-align: right;">Does this amount include interest or other charges? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001 (c)(2)(A).</div>	
8. What is the basis of the claim?	<div>Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.</div> <div>Money Loaned _____</div>	
9. Is all or part of the claim secured?	<div><input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: 151 Legion Road Bloomsburg, PA 17815</div> <div><input checked="" type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i>. <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____</div> <div>Basis for perfection: Recorded Mortgage Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)</div> <div>Value of property: \$ _____ Amount of the claim that is secured: <u>\$195,004.58</u></div> <div>Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)</div> <div>Amount necessary to cure any default as of the date of the petition: <u>\$22,470.34</u> Annual Interest Rate (when case was filed) <u>4.00%</u></div> <div><input checked="" type="checkbox"/> Fixed <input type="checkbox"/> Variable</div>	
10. Is this claim based on a lease?	<div><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____</div>	
11. Is this claim subject to a right of setoff?	<div><input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____</div>	

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check all that apply:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B)

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 05/30/2024
MM / DD / YYYY

/s/ **Michael P. Farrington Esq. Attorney ID# 329636**

Signature

Print the name of the person who is completing and signing this claim:

Name **Michael P. Farrington**
First name Middle name Last name

Title **Bankruptcy Attorney**

Company **KML Law Group, P.C.**

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address **701 Market Street, Suite 5000**
Number Street

Philadelphia
City

PA 19106
State ZIP Code

Contact **(215) 825-6488**
phone

Email **mfarrington@kmlawgroup.com**

